

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC. 20554**

<b>In the Matter of</b>	)	
	)	
<b>Amendment of Part 15 regarding</b>	)	<b>ET Docket No. 04-37</b>
<b>new requirements and</b>	)	
<b>measurement guidelines for Access</b>	)	
<b>Broadband over Power Line</b>	)	
<b>Systems</b>	)	

**To: The Commission**

**Reply Comment from Nickolaus E. Leggett  
N3NL Amateur Radio Operator**

The following is a reply comment from Nickolaus E. Leggett, an amateur radio operator (Extra Class licensee – call sign N3NL), inventor (U.S. Patents # 3,280,929 and 3,280,930 and one electronics invention patent application pending), and a certified electronics technician (ISCET and NARTE). I also have a Master of Arts degree in Political Science from the Johns Hopkins University (May 1970).

This Reply Comment is in reply to the comments filed by the National Telecommunications and Information Administration (NTIA).

**BPL Emissions Identification**

In its comments, the NTIA has stated that they are considering the possibility of adding a code signal that would allow a conventional communications receiver to detect the presence of BPL emissions.

“Insofar as BPL signal identification using these parameters requires a spectrum analyzer, NTIA is further considering whether a code signal should be transmitted to enable identification

using a standard communications receiver - modulation of any such a code must not increase interference risks.”

Such a code is highly desirable because most radio operators do not have practical access to a spectrum analyzer. The code could be a simple rhythmic tone such as a Morse code letter that would indicate to the radio operator that BPL emissions are present at his or her location.

### **Ionosphere propagation of BPL Radio Emissions**

The NTIA has stated that numerous Access BPL devices must be installed before ionosphere propagation of BPL radio noise becomes a problem.

“On the basis of worst-case oriented analyses of ionospheric propagation and aggregation of radiated emissions from Access BPL systems, NTIA concludes that hundreds of thousands of Access BPL devices conforming to current BPL rules (limits and measurement procedures) would have to be deployed nationally to cause a 1 dB increase in median radio noise power at any location, globally. Using NTIA’s recommended rules, chiefly the mandatory power control and use of a 5 dB height correction factor, it would take millions of BPL devices to cause a 1 dB increase in median radio noise.”

If BPL becomes the commercial success that its supporters want it to be, it will quickly grow to include hundreds of thousands of Access BPL devices. A fully successful BPL technology can grow to millions of devices.

It is the Commission’s responsibility to plan now for this possible consequence of successful BPL. Since the Commission does not appear to want to delay the BPL docket to consider this issue, the Commission should issue another Notice of Proposed Rulemaking to create rules specifically oriented to ionosphere propagation of BPL emissions.

This new NPRM should examine the potential need for corrective measures such as rationing the number of Access BPL devices that are authorized in specific regions (and in the Nation as a whole) as well as possible changes to the power limits for BPL devices.

**Respectfully Submitted,**

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**Statement of Service**

A paper copy of this reply comment has been sent to the National Telecommunications and Information Administration by USPS First Class Mail.

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